

NANCI L. CLARENCE (State Bar No. 122286)
CRAIG H. BESSENGER (State Bar No. 245787)
CLARENCE & DYER LLP
899 Ellis Street
San Francisco, California 94109
Telephone: 415.749.1800
Facsimile: 415.749.1694
Email: nclarence@clarencedyer.com
cbessenger@clarencedyer.com

Attorneys for Defendant Jeffrey Harrison

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY HARRISON,

Defendant.

CR No.: 07-0594 PJH

**STIPULATION AND [PROPOSED]
ORDER REGARDING DEFENDANT
JEFFREY HARRISON'S TRAVEL
REQUEST**

On March 10, 2008, defense counsel filed a stipulation and proposed order with the Court regarding Mr. Harrison's request to travel to Los Angeles, California to attend his son's wedding. Later that day, defense counsel received a copy of Rich Sarlatte's memorandum to the Court regarding Mr. Harrison's alleged violation of the terms of his pretrial release.

Defense counsel subsequently spoke with Mr. Sarlatte and AUSA Denise Barton separately and informed them that the stipulation and proposed order for Mr. Harrison's travel request would be withdrawn pending the resolution of Mr. Sarlatte's concerns at a hearing. On March 11, 2008, prior to the stipulation and proposed order being withdrawn, the Court signed the proposed order authorizing Mr. Harrison's travel.

In light of the timing of these events, the Government and defense counsel now agree that Mr. Harrison will not travel to Los Angeles as planned, pending the outcome of the hearing requested by Mr. Sarlatte.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March ____, 2008

Honorable James Larson
United States District Chief Magistrate Judge

Approved as to form:

/s/: Craig H. Bessenger
CRAIG H. BESSENGER
Clarence & Dyer LLP
Attorneys for Defendant Jeffrey Harrison

/s/: Denise Marie Barton
DENISE MARIE BARTON
Assistant United States Attorney

Proof of Service

I, Abbie Chin, declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San Francisco.

On March 12, 2008, I served a copy, with all exhibits, of the following documents:

• **STIPULATION AND [PROPOSED] REGARDING DEFENDANT JEFFREY HARRISON'S TRAVEL REQUEST**

 X (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All pleadings and papers must be electronically served in accordance with those Rules or General Orders with email address(es) as noted below:

Denise Marie Barton

United States Attorney's Office
450 Golden Gate Avenue, 11th Floor
Box 36055
San Francisco, CA 94102
415-436-7359
Fax: 415-436-7234
Email: denise.barton@usdoj.gov

 X (BY FAX) By transmitting by facsimile machine to the number addressed as below; the facsimile machine I used complied with California Rules of Court, rule 2003 and no error was reported by the machine. Pursuant to California Rules of Court, rule 2006(d), I caused the machine to print a transmission record of the transmission.

Rich Sarlatte

United States Pretrial Services
Fax: (415) 436-7517

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct and that this declaration was executed on the above stated date.

/s/: Abbie Chin
Abbie Chin